

EXHIBIT 2



Deposition of:
Daniel Smith , Ph.D.

January 28, 2020

In the Matter of:
**Fair Fight Action, Inc., Et Al. Vs.
Raffensperger, Brad, Et Al.**

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1 style.

2 Q. And of that subset of absentee votes, you
3 found a white voter rejection rate of 2.3 percent and a
4 black voter rejection rate of 3.7 percent?

5 A. Yes, that's correct.

6 Q. And you note that the rejection rate for black
7 voters is nearly 65 percent higher than the rejection
8 rate for white voters, correct?

9 A. Yes.

10 Q. And unless I missed somewhere, you're not
11 really opining about why that is, you're just pointing
12 out that it is; is that correct?

13 A. Again, I think that's correct. I'm letting
14 the data speak for themselves.

15 Q. And did you conduct any sort of analysis to
16 determine whether these results could be equally
17 explained by chance, any sort of progression or any
18 analysis on that front?

19 A. I'm really kind of opposed to that type of
20 analysis because this is actually the administrative
21 data of record.

22 And so I have stayed away in this table and
23 from doing that type of analysis because I can, on the
24 face of it, say that not only is 3,162 greater than
25 2,468, I can also say that of those who cast mail-in